

HUMBOLDT HOUSING & HOMELESS COALITION



HUMBOLDT COUNTY CONTINUUM OF CARE

HOMELESS MANAGEMENT INFORMATION SYSTEM POLICIES AND
PROCEDURES

NOVEMBER 2015

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I. COUNTY RESPONSIBILITIES

Humboldt County as the HMIS Lead Agency:

1. Will provide the Agency HMIS access via a third party software vendor, Bowman Systems (Service Point System), via agency provided internet connection. Service Point is a web-based case management system with an HMIS component.
2. May at its sole discretion provide for a limited number of user licenses to each participating HMIS agency.
3. Will provide model Privacy Notices, Client Consent forms, data collection forms and other templates for agreements that may be adopted or adapted by individual agencies.
4. Will provide both initial training and periodic updates to that training for key Agency Staff regarding the use of the HMIS, with the expectation that the Agency will take responsibility for conveying this information to all Agency Staff using the system.
5. Will provide basic user support and technical assistance for the HMIS module of Service Point (i.e., general trouble-shooting and assistance with standard report generation). Access to this basic technical assistance will normally be available from 9:00 AM. to 5:00 PM. on Monday through Friday (with the exclusion of holidays).
6. Update the system to maintain compliance with the HUD Data and Technical Standards.
7. Run aggregate reports for the purpose of planning and reporting to funders.
8. Will not publish reports on client data that identify specific agencies or persons, without prior agency (and where necessary, client) permission. Public reports otherwise published will be limited to presentation of aggregated data within the HMIS database.
9. Annually report to HUD for Annual Homeless Assessment Report and Consolidated Plan as part of the McKinney Vento funding application.
10. Will produce quarterly aggregate reports and analysis.

Humboldt County responsibilities may also be found in the CoC-HMIS Governance Charter.

II. AGENCY RESPONSIBILITIES

The Agency as a contributor to HMIS:

1. Will use HMIS to report to HUD as and when required.
2. Will assure that privacy and security requirements are met as detailed in the HUD HMIS Data and Technical Standards.
3. Will annually, conduct a thorough review of internal policies and procedures regarding HMIS.
4. Will assure that agency end users are properly trained and sign End User agreements.
5. Will be responsible for maintaining agency HMIS user IDs.
6. Will assure internet connectivity and functionality.
7. Will maintain the agency data in the HMIS. HMIS data should be entered into ServicePoint no longer than 10 working days after client enters project.
8. Will safeguard the privacy of client information.

Agency responsibilities may also be found in the CoC-HMIS Governance Charter.

III. PRIVACY AND CONFIDENTIALITY

COMPLIANCE WITH FEDERAL AND STATE LAWS

1. The Agency will comply with all relevant Federal and California State laws and regulations that protect client records and privacy. Agency's duties under this provision include, but are not limited to, complying with the following:
 - A. The Federal confidentiality rules as contained in the Code of Federal Regulations (CFR) 42, Part 2 Confidentiality of Alcohol and Drug Abuse Patient Records, regarding disclosure of alcohol and/or drug abuse records. In general terms, the Federal regulation prohibits the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by CFR 42, Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that the Federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
 - B. The Health Insurance Portability and Accountability Act of 1996 and corresponding regulations passed by the U.S. Department of Health and Human Services. In general, the regulations provide consumers with new rights to control the release of medical information, including advance consent for most disclosures of health information, the right to see a copy of health records, the right to request a correction to health records, the right to obtain documentation of disclosures of information may be used or disclosed. The current regulation provides protection for paper, oral, and electronic information.
 - C. The Confidentiality of Medical information Act, California Civil Code Section 56 et seq.
 - D. The provisions in California Government Code 11015.5 regarding Personal Information Collected on the Internet. In general, the Government Code ensures that any electronically collected personal information about clients cannot be shared with any third party without the client's written consent.
2. Agency shall only release client records upon prior receipt of a valid written consent, unless otherwise authorized to do so by law.

PRIVACY NOTICES

1. Privacy notices must be posted at the agency. The Agency shall post Privacy Notices at each intake desk or comparable location. Agency shall also make Privacy Notices available in writing at the client's request.
2. If the Agency maintains an agency website, a link to its Privacy Notice must be on the homepage of the Agency's website.

CLIENT CONSENT

1. Many agencies currently participating in HMIS use inferred consent to collect HMIS data. Agency may opt to utilize either inferred or informed consent. County shall provide Agency with a HMIS Client Consent Form template (which can and should be amended to meet Agency's specific requirements) to document informed consent for each client entered into the Humboldt County HMIS system. If clients refuse consent their data may be entered into the Humboldt County HMIS system and not shared with other agencies.
2. Agency shall maintain physical copies of client consent forms and other data entry supporting documentation for a minimum of seven years and shall allow County to conduct annual audits of client records.

3. Agency shall allow clients to view their own HMIS data, upon written request; request changes and corrections in accordance with Agency's procedures; and pursue Agency's grievance process.

IV. DATABASE INTEGRITY

GENERAL RULES

1. Agency staff participating in HMIS shall commit to abide by the governing principles of HMIS and adhere to the terms and conditions of the Agency User Agreement, attached hereto and incorporated herein by reference as Exhibit 1.
2. The Agency shall only request user access to HMIS for those staff that require access to perform their job duties.
3. All users must have their own unique user ID and should never use or allow use of a user ID that is not assigned to them. [See Agency User Agreement].
4. Temporary, first time only, passwords will be communicated via email to the owner of the user ID.
5. User-specified passwords should never be shared and should never be communicated in any format.
6. New user IDs requires password change on first use.
7. Passwords must consist of at least 8 but no more than 50 characters and must include at least two numbers or symbols.
8. Passwords are valid for 45 days. Users will be prompted by the system to change their password at regular intervals.

REQUEST NEW USER ID

1. When a staff member requires access to HMIS, the staff member shall contact the HMIS System Administrator who will provide the prospective user with a copy of the Agency User Agreement.
2. HMIS System Administrator shall ensure that the prospective user reads, understands and signs the agreement.
3. The HMIS System Administrator and the HMIS Agency user will co-sign the agreement. The HMIS System Administrator and the HMIS Agency user will both retain a copy of the HMIS User's Agreement.
4. The HMIS System Administrator will create the new user ID as specified in the Client Services Network Administrators Guide and notify the user ID owner of the temporary password via email.

CHANGE USER ACCESS

1. When it is determined necessary to change a HMIS Agency user's access level, the HMIS Agency user will notify the HMIS System Administrator.

RESCIND USER ACCESS

1. When a HMIS Agency user leaves Agency, the HMIS System Administrator shall be notified. The HMIS System Administrator will reclaim the ServicePoint license and remove his/her name immediately from the user list.

RESET PASSWORD

1. When a HMIS Agency user forgets his or her password or has reason to believe that someone else has gained access to his or her password, he or she must immediately notify the HMIS System Administrator.
2. The HMIS System Administrator will reset the user's password and notify the user of the new temporary password.

V. HMIS DATA

OVERVIEW

1. HMIS Data is highly confidential. Agency agrees that it shall not use or disclose information other than as permitted or required by this agreement or as required by law.
2. Agency shall use appropriate standards to prevent use or disclosure of the information other than as permitted by this agreement. Agency owns and is responsible for the client data associated with its own programs. Agency is encouraged to use its own HMIS data for public relations, reporting and funding as long as client confidentiality is maintained.
3. While acting within this agreement, Agency has the ability to view information for its own programs, enter and edit information, enter unlimited numbers of clients and services, run unlimited numbers of reports, and to export data for further reporting.
4. As set forth in Section 1. the County will publish quarterly community-wide aggregate HMIS homeless data (not agency specific). These reports will be raw point-in-time data. Agency may also use published HMIS data.
5. The County will not release proprietary information about agencies, their services, procedures, or client demographics without permission of the agency.
6. The County may use HMIS data for planning, reporting and grant writing processes including Consolidated Plans, Gaps Analysis, HUD reporting, Emergency Shelter Grants, etc, and may reconcile and release aggregate data.

COLLECTION AND ENTRY OF CLIENT DATA

1. As a contributing HMIS Agency, Agency shall enter client specific data into HMIS that is accurate, complete, and timely and in accordance with the following requirements:
 - a. Agency shall gather client data according to the policies, procedures and confidentiality rules of the Agency.
 - b. Agency shall collect all universal and program data elements from the 2014 HMIS Data Standards Data Manual, Version 3.1, September 2015 and the HMIS Data Standards Data Dictionary Version 3.1, September 2015.
 - c. Agency shall enter client data into HMIS in a timely manner (10 working days maximum from point of program entry)
 - d. Agency shall keep all client data entered into HMIS as accurate and as current as possible.
 - e. Agency shall continue to maintain hardcopy or electronic files according to Agency's requirements.
 - f. Any authorized data imports will be the responsibility of Agency.
 - g. Agency is responsible for the accuracy, integrity, and security of all data input by Agency.
 - h. Agency is responsible for a baseline of data quality to include: non-duplication of client record, Universal & Program level data elements as defined by HUD Data Standards, up-to-date Program Entries and Exits.

2. Data quality shall be a concern of highest importance to the Agency, which will use its best efforts to continuously improve quality. Quality assurance shall be the ultimate responsibility of Agency's, in consultation with County, as the HMIS Lead Agency.

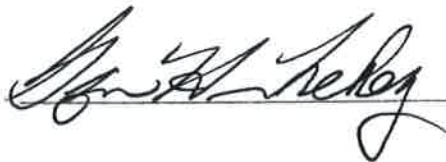
VI. CUSTODY OF DATA

1. The Agency acknowledges, and the County agrees, that the Agency retains ownership over all information it enters into the Humboldt County HMIS system.
2. In the event that the HMIS ceases to exist, Agency will be notified by the County and provided reasonable time to access and save client data on those served by the Agency, as well as statistical and frequency data from the entire system. Thereafter, the information collected by the centralized server will be purged according to Bowman's policies and/or appropriately stored by the County.
3. In the event that the County ceases to be the Lead HMIS Agency, County will use its best efforts to transfer the custodianship of the data within Humboldt County HMIS to another organization for continuing administration, and Agency will be informed in a timely manner.

VII. AGENCY USER AGREEMENT

Refer to the Agency Partnership Agreement and HMIS User Agreement appended to this document.

HMIS Lead Signature:



CoC Representative Signature:



Date:

11/12/2015



HUMBOLDT HOUSING AND HOMELESS COALITION HUMBOLDT COUNTY CONTINUUM OF CARE

Homeless Management Information System (HMIS) Partner Agency Agreement

This agreement is between each agency participating in the Humboldt County HMIS, Humboldt County, and the System Administrator. In this agreement, “Agency” is the agency signing the agreement and participating in Humboldt County HMIS, and “Client” is a consumer of services.

The signature of the Executive Director of the Agency indicates agreement with the terms set forth below and is required in order for the System Administrator to establish an account for the Agency.

I PURPOSE

The Humboldt Housing and Homeless Coalition (HHHC), Humboldt County Continuum of Care Homeless Management Information System is a web-enabled database used by homeless service providers within Humboldt County to capture information about the persons they serve.

The goal of HHHC CoC HMIS is to go beyond the HUD mandate of producing unduplicated counts of homeless persons. Our mission is to provide a comprehensive case management system to advance the provision of quality services for homeless persons, improve data collection, and promote more responsive policies to end homelessness in Humboldt County.

II CONFIDENTIALITY

- a) The Agency shall uphold relevant federal and state confidentiality regulations and laws that protect Client records. The Agency shall only release Client records with written consent by the Client, unless otherwise provided for in the regulations.
- b) The Agency shall abide specifically by federal confidentiality regulations as contained in the Code of Federal Regulations, 42 CFR Part 2 regarding disclosure of alcohol and/or drug abuse records. In general terms, the federal rules prohibit the disclosure of alcohol and/or drug abuse records unless disclosure is expressly permitted by written consent of the person to whom it pertains or as otherwise permitted by 42 CFR Part 2. A general authorization for the release of medical or other information is not sufficient for this purpose. The Agency understands that federal rules restrict any use of the information to criminally investigate or prosecute any alcohol or drug abuse patients.
- c) The Provider Agency will abide specifically, when applicable, with the Health Insurance Portability and Accountability Act of 1996 (HIPAA) and corresponding regulations passed by the Federal Department of Health and Human Services. In general, the regulations provide consumers with new rights to control the release of medical information, including the right: to give advance consent prior to disclosures of health information; to see a copy of health records; to request a correction to health

records; to obtain documentation of disclosures of health information; to obtain an explanation of privacy rights and to be informed about how information may be used or disclosed. The current regulation provides protection for paper, oral and electronic information.

- d) The Provider Agency will abide by California State Laws and Federal Laws related to confidentiality and security of medical, mental health and substance abuse information as found in California Revised Statutes Title 12, California Revised Statutes Title 36, 42 CFR Part 2 and other relevant statutes, rules and regulations.
- e) The Agency shall provide a verbal explanation of the HMIS database and the terms of consent and shall arrange for a qualified interpreter or translator in the event that an individual is not literate in English or has difficulty understanding the consent form.
- f) The Agency shall not solicit or input information from Clients into the HMIS database unless it is essential to provide services or to conduct evaluation or research.
- g) The Agency agrees not to release any confidential information received from the HMIS database to any organization or individual without proper Client consent.
- h) The Agency shall ensure that any staff, volunteers and other persons issued a User ID and password for HMIS receives basic confidentiality training.
- i) The Agency understands the file server, which will contain all Client information; including encrypted identifying Client information will be located off-site at Bowman Systems.
- j) The Agency shall maintain appropriate documentation of Client consent to participate in the HMIS database.
- k) The Agency shall not be denied access to the Client data it enters into HMIS. The Agency shall diligently record in HMIS all restrictions requested by the Client. The Agency shall not knowingly enter false or misleading data under any circumstances. All Agencies are bound by all restrictions placed upon the date by the Client.
- l) If this Agreement is terminated, the System Administrator and remaining agencies participating in HMIS shall maintain their right to the use of all Client data previously entered by the terminating Agency; this use is subject to any restrictions requested by the Client.
- m) The Agency will utilize the Humboldt County HMIS Client Informed Consent/Release of Information form for all clients providing information for the HMIS database. Once signed by the Client, the form authorizes Client data to be entered into the HMIS database.
- n) If a Client withdraws consent for release of information, the Agency remains responsible to ensure that the Client's information is no longer available to HMIS or other agencies.
- o) The Agency shall keep signed copies of the Client Informed Consent/Release of Information forms for Humboldt County HMIS for a period of three years.

- p) The Agency will not require or imply that its services are contingent upon a Client's participation in the HMIS database. Services should be provided to Clients regardless of participation provided the Clients would otherwise be eligible for the services.

III HUMBOLDT COUNTY HMIS USE AND DATA ENTRY

- a) The Agency shall follow, comply with and enforce the *Partner Agency Agreement, User Policy, & Code of Ethics*. Modifications to the *Partner Agency Agreement, User Policy, & Code of Ethics* shall be established in consultation with other agencies, and may be modified as needed for the purpose of the smooth and efficient operation of the HMIS system. The System Administrator will announce approved modifications in a timely manner.
- b) The Agency shall only enter individuals in the HMIS database that exist as Clients under the Agency's jurisdiction. The Agency shall not misrepresent its Client base in the Humboldt County HMIS database by entering known, inaccurate information. The Agency shall use Client information in the Humboldt County HMIS database, as provided to the Agency or other agencies, to assist it in providing adequate and appropriate services to the Client.
- c) The Agency shall consistently enter information into the Humboldt County database and will strive for real-time, or close to real-time data entry. Real-time or close to real-time is defined by either immediate data entry upon seeing a Client, or data entry into the HMIS database by the 15th of the following month.
- d) The Agency shall utilize the HMIS database for business purposes only.
- e) The HMIS System Administrator will provide initial training and periodic updates to that training to select Agencies on the use of the HMIS software.
- f) The HMIS System Administrator will be available for technical assistance within reason (i.e. troubleshooting and report generation).
- g) The transmission of material in violation of any federal or state regulations is prohibited. This includes, but is not limited to, copyright material, material legally judged to be threatening or obscene, and material considered protected by trade secret.
- h) The Agency shall not use the HMIS database with intent to defraud federal, state or local governments, individuals or entities, or to conduct any illegal activity.
- i) The Agency will contact the Administrator(s) immediately upon any user termination or resignation from the Agency.

IV REPORTS

- a) The Agency shall retain access to identifying and statistical data on the Clients it serves.
- b) The Agency may make aggregate data available to other entities for funding or planning purposes

pertaining to providing services to homeless persons. However, such aggregate data shall not directly or indirectly identify individual Clients.

- c) The HMIS System Administrator will use only unidentified, aggregate HMIS data for homeless policy and planning decisions, in preparing federal, state or local applications for homelessness funding, to demonstrate the need for and effectiveness of programs and to obtain a system-wide view of program utilization in the state.

V PROPRIETARY RIGHTS OF BOWMAN SYSTEMS

- a) The Agency shall not give or share assigned passwords and access codes of the HMIS database with any other Agency, business, or individual.
- b) The Agency shall not cause in any manner, or way, corruption of the HMIS database in any manner.

VI TERMS AND CONDITIONS

- a) Neither the HMIS System Administrator nor the Agency shall transfer or assign any rights or obligations without the written consent of the other party.
- b) This Agreement shall be in force until revoked in writing by either party provided funding is available.
- c) This Agreement may be terminated with 30 days written notice.

AGENCY NAME _____

SIGNATURE OF EXECUTIVE DIRECTOR _____

DATE _____



**HUMBOLDT HOUSING AND HOMELESS COALITION
HUMBOLDT COUNTY CONTINUUM OF CARE**

*Homeless Management Information System (HMIS)
User Agreement*

USER POLICY

Partner Agencies who use the HMIS and each User within any Partner Agency is bound by various restrictions regarding the Client information. It is the Client's decision about which information, if any, is entered into the HMIS. Before entering any identifiable Client information into ServicePoint™, the User must ascertain that the Client has signed a Release of Information (ROI).

USER RESPONSIBILITY

Your User ID and Password give you access to Humboldt County's ServicePoint™ HMIS System. **Initial each item below to indicate your understanding and acceptance of the proper use of your User ID and password.**

- _____ My User ID and Password are for my use only and must not be shared with anyone.
- _____ I must take all reasonable means to keep my Password physically secure.
- _____ I understand that the only individuals who can view information in the ServicePoint system are authorized Users and the Clients to whom the information pertains.
- _____ I will keep my computer monitor positioned so that persons not authorized to use HMIS cannot view it.
- _____ I may only view, obtain, disclose, or use the database information that is necessary to perform my job.
- _____ If I am logged into ServicePoint and must leave the work area where the computer is located, I must log-off of ServicePoint before leaving the work area.
- _____ Failure to log off ServicePoint appropriately may result in a breach in client confidentiality and system security.
- _____ I will store hard copies of Humboldt HMIS information in a secure location such as a locked file cabinet. I will not leave such hard copy information in public view on my desk, or on a photocopier, printer or fax machine.
- _____ I will properly destroy paper copies of HMIS information when they are no longer needed unless they are required to be retained in accordance with applicable law.
- _____ I will not discuss HMIS confidential Client information with staff, Clients, or Client family members in a public area.

_____ I will not discuss HMIS confidential Client information on the telephone in any areas where the public might overhear my conversation.

_____ I will not leave messages on my agency’s answering machine or voicemail system that contains HMIS confidential Client information.

_____ I will keep answering machine volume low ensuring HMIS confidential information left by callers is not overheard by the public or unauthorized persons.

_____ If I notice or suspect a security breach, I must immediately notify the HMIS System Administrator.

_____ I understand that a failure to follow these security steps appropriately may result in a breach of Client HMIS confidentiality and HMIS security. If such a breach occurs, my access to the HMIS may be terminated and I may be subject to further disciplinary action as defined in the Partner Agency’s personnel policy.

I understand and agree to comply with all the statements listed above.

_____ ServicePoint User Signature Date

_____ Agency/System Administrator Date

_____ Agency Executive Director Date

Not Reviewed or Endorsed by HUD

The County of Humboldt/City of Eureka Public Housing Authority does not have an established homeless preference, and this document does not apply.

HUMBOLDT HOUSING & HOMELESS COALITION



HUMBOLDT COUNTY CONTINUUM OF CARE

HOMELESS MANAGEMENT INFORMATION SYSTEM GOVERNANCE
CHARTER

ADOPTED NOVEMBER 13, 2015

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EXECUTIVE SUMMARY

HMIS OVERVIEW

The United States Department of Housing and Urban Development (HUD) defines the Homeless Management Information System (HMIS) as the information system designated by the Continuum of Care (CoC) to comply with HUD's data collection, management, and reporting standards. The HMIS collects data to measure the efficacy of services provided to homeless persons and those persons at risk of homelessness. It is intended to generate unduplicated counts of homeless persons, as well as explore the nature of homelessness in general. The data collected by the HMIS are used to drive evidence-based decisions at the local, state, and national level, with the ultimate goal to eradicate homelessness in the United States.

This document outlines the Humboldt County CoC HMIS Governance structure that governs Humboldt County CoC HMIS operations, while dictating the roles and responsibilities of all parties involved. This document is to be use in tandem with the Humboldt County CoC HMIS Policies and Procedures Manual, which outlines the policies, procedures, guidelines, and standards for Humboldt County CoC HMIS operations.

HUMBOLDT COUNTY COC HMIS GOVERNANCE CHARTER

This Humboldt County CoC HMIS Governance aims to provide structure for decision-making, as well as formalize the roles and responsibilities of all HMIS entities. It defines the relationship between the HMIS implementation, the Humboldt County Continuum of Care, and the participating providers, and establishes oversight and leadership expectations surrounding the HMIS.

HUMBOLDT COUNTY COC HMIS GOVERNANCE MODEL

The Humboldt County HMIS Governance Group is responsible for day-to-day oversight of the CoC's HMIS. This Governance Group is comprised of the following:

- CoC representatives
- HMIS Lead Agency Staff
- HMIS System Administration Contract Staff
- Participating Agency Staff and Consumers

However, in this governance model, the Humboldt Housing & Homeless Coalition (HHHC) Executive Committee, acting in its capacity as the CoC Board, is responsible for all final decisions regarding the planning of policies and procedures, coordination of resources, data integration, determination of software applications, while also directing the HMIS lead agency.

DESIGNATIONS

HUMBOLDT COUNTY CONTINUUM OF CARE (COC)

The entity is composed of representatives of relevant organizations in the County of Humboldt, which generally includes nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement, organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and those persons at risk of homelessness for the County of Humboldt.

HMIS LEAD AGENCY AND ADMINISTRATOR (HUMBOLDT COUNTY DEPARTMENT OF HEALTH AND HUMAN SERVICES)

The entity designated by the Humboldt County CoC to oversee the day-to-day administration of the HMIS system. The responsibilities and duties of the HMIS Lead Agency include:

- Provide agency access to the HMIS via a third-party software vendor;
- Provide for a limited number of user licenses to each participating HMIS agency;
- Provide model Privacy Notices, Client Consent forms, data collection forms, and other templates for agreements that may be adopted or adapted by individual agencies;
- Provide both initial training and periodic updates to that training for key agency staff regarding the use of the HMIS, with the expectation that the Agency will take full responsibility for conveying this information to all Agency Staff using the system;
- Provide basic user support and technical assistance for the HMIS module (i.e., general troubleshooting and assistance with standard report generation
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- Update the system to maintain compliance with the HUD Data and Technical Standards.
- Run aggregate reports for the purpose of planning and reporting to funders.
- Hold confidential reports on client data that identify specific agencies or persons, without prior agency (and where necessary, client) permission. Public reports otherwise published will be limited to presentation of aggregate data within the HMIS database.
- Annually report to HUD for Annual Homeless Assessment Report and Consolidate Plan as part of McKinney-Vento funding application.
- Produce quarterly aggregate reports and analysis.
- Ensure all recipients of funds from the Emergency Solutions Grants Program (ESG) and programs authorized by Title IV of the McKinney-Vento Act participate in HMIS (as applicable).
- Develop written policies and procedures for all Covered Homeless Organizations (CHOs).
- Execute an HMIS participation agreement with each CHO.
- Serve as the applicant to HUD for any HMIS grants that will cover the CoC geographic area.
- Monitor compliance by all CHOs with the CoC.

- Submit a Security Plan, Data Plan, Data Quality Plan, and a Privacy Plan to the CoC for approval within 6 months of the finalization stage of the HMIS Requirements Proposed Rule. These documents must be reviewed and updated annually. Implementation of the policies outlined in the plans must be implemented within 6 months of the date of CoC approval of the plans.

Note: The HMIS Lead is the only organization with the authority by the CoC to make system-wide decisions regarding the HMIS. Their decisions will impact all CHOs within the continuum.

HMIS COMMITTEE

Group of entities that provide recommendations on use of software and software enhancement. At least one homeless person or formerly homeless person must participate in policymaking. Participation can include but is not limited to the following entities (as defined by HUD): governing board leadership, advisory committees, staff positions, and sub-committee positions.

HMIS SOFTWARE APPLICATION

The CoC has designated ServicePoint software to serve as its HMIS. ServicePoint is a product of Bowman Systems L.L.C., and will hereafter be referred to as ServicePoint.

PARTICIPATING AGENCIES

Any agency that makes reasonable efforts to record all HUD-defined Universal Data Elements and all other required data elements as outlined by HUD funding requirements on all clients served, and discloses these data elements to the HMIS Lead Agency.

Any agency providing homeless services and wishing to participate in HMIS will complete and submit a HMIS Participation Agreement application. This application is reviewed by the HMIS Lead for approval. In the event there is a question regarding the need to participate, the application is taken to the HMIS Committee for approval/denial.

The HMIS Committee has given the HMIS Lead authorization to approve applicants to use HMIS if the HMIS Lead is confident that the applying agency is serving the homeless population.

HMIS GRANTEE

Entity responsible for soliciting, collecting, and analyzing feedback from end-users, program managers, agency executive directors, and homeless persons.

HMIS FUNDING

HMIS Leads and CHOs must refer to program regulations to determine how funds are made available. Program regulations for the HUD McKinney-Vento Act programs can be found in the regulations of Chapter V of title 24 of the Code of Federal Regulations. These regulations explain how funds are made available, and the requirements attached to those funds.

ESG & McKinney-Vento Act funding recipients and sub-recipients must participate in the ServicePoint system. Only homeless service providers receiving CoC and ESG funding can access HMIS funding.

STATUTORY AUTHORITY

The implementation of the McKinney-Vento Act in 1987 created valuable programs aimed to assist homeless persons or persons at risk for homelessness regain independence and stability. However, despite its promising beginnings, the McKinney-Vento Act, and the programs it fostered, operated without measurement of efficacy for over 15 years; no government entity conducted a comprehensive review. Therefore, in 2001, Congress enlisted the U.S. Department of Housing and Urban Development (HUD) to enforce the requirement that every jurisdiction present to Congress unduplicated client-level data within three years.

HUD formulated a strategic plan to test the efficacy of the McKinney-Vento Act while also improving data collection, reporting, and analysis at the local and national levels. Their strategy consisted of four approaches:

- They established funding for the implementation and maintenance of HMIS.
- They created a technical assistance program to assist jurisdictions in their data collection, analysis, and reporting efforts.
- They initiated the development of the nationwide Annual Homeless Assessment Report (AHAR) as means to present to Congress collective homeless data from individual jurisdictions nationwide.
- They began to analyze the most viable approaches to obtaining homeless client-level reporting

This plan amplified competition among CoCs as they strived to obtain homeless assistance funding. As the importance of HMIS applications increased, so did their complexity and sophistication.

CoCs became increasingly aware of the data collection and reporting requirements imposed by Congress, and in 2004, HUD submitted their Third Progress Report to Congress. As a result, Congress and HUD implemented the first HMIS Data and Technical Standards Final Notice. This Notice made the implementation and maintenance of HMIS mandatory to obtain Federal funding for homeless relief efforts. The HMIS data requirements were further modified in 2010, 2014, and 2015. The current version of the data standards is the 2014 HMIS Data Standards Data Manual, Version 3.1, September 2015, and the HMIS Data Standards Data Dictionary Version 3.1, September 2015.

Collectively, these provisions provide statutory requirements for this governance charter, which aims to organize the accurate collection and reporting of comprehensive data regarding the characteristics and needs of homeless persons and those at risk of homelessness.

POLICIES & PROCEDURES

This section is comprised of six (6) sections:

1. Planning & Software Selection
2. HMIS Management & Operations: Governance & Management
3. HMIS Management & Operations: Compliance Monitoring
4. HMIS Management & Operations: Data Quality
5. HMIS Development & Oversight
6. Other Federal Requirements

1. PLANNING & SOFTWARE SELECTION

The following policies and procedures are derived from the most recent HUD HMIS Requirements (2015).

1.1 HMIS PLANNING & STRATEGIC ACTIVITIES

Development of activities related to HMIS growth. These activities will be reviewed regularly, and remain in accordance with the CoC's goals.

RESPONSIBLE PARTY: HMIS LEAD

1.2 HMIS PROGRAM MILESTONES DEVELOPMENT

Identification of general milestones for project management, including training, expanded system functionality, etc.

RESPONSIBLE PARTY: HMIS LEAD

1.3 UNIVERSAL DATA ELEMENTS

HMIS must be equipped to manage the collection of each data variable and corresponding response categories for the Universal Data Elements as outlined in the 2015 HMIS Data and Technical Standards.

Although HUD strives to ensure that the HMIS remains “a system of accuracy, integrity, and confidentiality” they are aware that excessively stringent technical, security, and data standards may limit the ability of CoCs to adapt to beneficial changes in technology. Therefore, the standards listed in the following section are broad in nature. HUD states they will provide specific details applicable to each area in a separate notice and public comment process, thus enabling them to be more responsive to changes in technology.

Proposed Requirements:

- HMIS must be capable of unduplicating client records, must contain fields that collect all HUD-required data elements, and must maintain historical data
- HMIS must generate Standard HUD Reports, Data Quality Reports, and Audit Reports

RESPONSIBLE PARTY: HMIS LEAD

1.4 PROGRAM-SPECIFIC DATA ELEMENTS

HMIS manages the collection of each data variable and corresponding response categories for the Program-Specific Data Elements as outlined in the 2015 HMIS Data and Technical Standards.

RESPONSIBLE PARTY: HMIS LEAD

1.5 UNDUPLICATED CLIENT RECORDS

HMIS generates a summary report of the number of unduplicated client records that have been entered into the HMIS.

RESPONSIBLE PARTY: HMIS LEAD

1.6 APR REPORTING

HMIS is consistently able to produce a reliable Annual Performance Report (APR).

RESPONSIBLE PARTY: HMIS LEAD

1.7 AHAR PARTICIPATION

Participation in the AHAR (Annual Homeless Assessment Report) is ensured.

RESPONSIBLE PARTY: HMIS LEAD

1.8 HMIS REPORTS

HMIS generates clients-served reports, utilization summary reports, and demographic reports at both the system and program levels for the purpose of understanding the nature and extent of homelessness.

RESPONSIBLE PARTY: HMIS LEAD

2. HMIS MANAGEMENT & OPERATIONS: GOVERNANCE & MANAGEMENT

2.1 HMIS GOVERNANCE STRUCTURE

Development of a HMIS governance model that is formally documented between the HMIS Lead Agency/grantee and the community planning body(ies). This document is to be a formal agreement that outlines management processes, responsibilities, decision-making structures, and oversight of the HMIS. Adherence to the agreement is to be regularly monitored (as evidence by a Memorandum of Understanding, Letter of Agreement, or similar such documentation).

HMIS Governance Standards:

- HMIS Lead is responsible for development of local HMIS policies and procedures
- HMIS Lead and CHO are responsible for ensuring that HMIS processing capabilities coincide with the privacy obligations of the CHO

- HMIS Lead must conduct annually (at minimum) an unduplicated count of clients served and an analysis of unduplicated amounts. This information is to be presented to the CoC and when requested by HUD.
- HMIS Lead must submit reports to HUD as required.
- CHO must comply with applicable standards from HMIS Requirements Proposed Rule.
- CHO must comply with federal, state, and local privacy laws. If a privacy or security standard conflicts with other federal, state, and local laws, the CHO and HMIS Lead are jointly responsible for updating the policies and procedures.
- HMIS Lead must develop a privacy policy.
- HMIS Lead must ensure HMIS vendor acts in accordance with HMIS standards issued by HUD.

RESPONSIBLE PARTY: COC

2.2 HMIS OVERSIGHT INCLUSIVE PARTICIPATION

Membership of the HMIS Committee is inclusive of decision makers representing the Humboldt CoC and community.

RESPONSIBLE PARTY: COC

2.3 HMIS IT ISSUE MONITORING (COMMUNITY LEVEL)

HMIS System service requests, activities, deliverables and resolutions are reviewed on a regular basis. When necessary, authoritative support is provided to expedite IT issue resolution.

RESPONSIBLE PARTY: HMIS LEAD

2.4 HMIS TECHNICAL SUPPORT

Technical expertise that is commensurate with the general HMIS program oversight is provided in addition to timely support on high-level technical matters. All necessary HMIS software changes in response to the changing requirements of participating agencies are reviewed and authorized. All general special issues presented by participating agencies are reviewed and authorized.

RESPONSIBLE PARTY: HMIS LEAD

2.5 HMIS SOFTWARE TECHNICAL SUPPORT

Technical expertise commensurate with the requirements of the HMIS software and/or system is provided; Timely support on software technical matters is provided; Authorized changes to the HMIS software and processes are implemented; Resolutions to any special issues authorized by the HMIS Technical Support Entity within the software and/or overall system are implemented.

RESPONSIBLE PARTY: HMIS LEAD

2.6 HMIS IT ISSUE TRACKING

An updated list of HMIS system service requests, activities, deliverables, and resolutions is maintained on a regular basis.

RESPONSIBLE PARTY: HMIS LEAD

2.7 HMIS STAFF ORGANIZATION CHART

A current and accurate organization chart that clearly identifies all team members, their roles and responsibilities, and general work activities/functions is maintained on a regular basis. This organization chart is made available for review.

RESPONSIBLE PARTY: HMIS LEAD

2.8 HMIS SOFTWARE TRAINING

Regular training on software usage, software and data security, and data entry techniques to participating agencies is provided. The development, updating, and dissemination of data entry tools and training materials occur on a regular basis. The system is monitored and ensured on a regular basis.

User Training: ServicePoint will provide training to instruct the System Administrator in the proper procedures required to supervise and maintain the operation of the HMIS. System Administration training will cover security, configuration, and user customization.

End User Training Schedule: The HMIS Lead will provide training in the day-to-day use of the system. Training classes will be offered as needed.

RESPONSIBLE PARTY: HMIS LEAD

2.9 SYSTEM OPERATION & MAINTENANCE

Operation and maintenance of the HMIS System is conducted on a daily basis.

RESPONSIBLE PARTY: HMIS LEAD

2.10 HMIS USER FEEDBACK

Mechanisms for soliciting, collecting, and analyzing feedback from end users, program managers, agency executive directors, and homeless persons are managed and maintained. Feedback includes impressions of operational milestones and progress, system functionality, and general HMIS operations. Examples of feedback include annual satisfaction surveys.

RESPONSIBLE PARTY: HMIS LEAD

3. HMIS MANAGEMENT & OPERATIONS: COMPLIANCE MONITORING

3.1 HMIS MANAGEMENT ISSUES

HMIS is managed in accordance to the policies, protocols, and goals of the Humboldt CoC.

RESPONSIBLE PARTY: COC

3.2 HMIS PROGRAM MILESTONES MONITORING

Milestones, notes variances, and reports variances to CoC membership is monitored.

RESPONSIBLE PARTY: HMIS LEAD

3.3 AGENCY AND PROGRAM HMIS PARTICIPATION

Program- and agency-level participation in HMIS is monitored on a regular basis via the comparison of point-in-time census of beds/slots to clients served. Agencies report all findings to the Humboldt CoC. All monitoring activity is documented.

RESPONSIBLE PARTY: COC

3.4 DATA AND SYSTEM SECURITY

Agency staff are instructed and required to adhere with the HMIS data and system security protocols as outlined by the CoC and the most current HUD HMIS Data and Technical Standards.

HMIS Security Standards:

- HMIS Lead must establish a security plan that is approved by the CoC
- HMIS Lead must designate a security officer
- HMIS Lead must report security incidents
- HMIS Lead must establish a disaster recovery plan
- HMIS Lead must conduct an annual service review
- HMIS Lead must ensure that each CHO designates a security officer
- HMIS Lead must ensure that each user completes user training (at the minimum annually)
- HMIS Lead must ensure that each CHO conducts an annual security review

RESPONSIBLE PARTY: HMIS LEAD

3.5 CLIENT CONSENT

Client consent is obtained and documented according to the Client Consent Policies and Protocols of the Humboldt CoC.

Interagency Data Sharing Agreements: Agencies that will be sharing client specific records must agree in writing to uphold specified minimum standards of privacy protection.

Written Client Consent Procedure For Data Entry: Agencies must obtain the client's consent prior to entering information concerning a client into the system. If a client does not consent, services should not be denied to the client. The agency can use the anonymous client function in appropriate cases.

Confidentiality And Consent Forms: Agencies must use the forms approved by the HMIS Committee. Agencies that share protected health information must have internal procedures for obtaining client consent prior to the sharing of this information.

Privacy Notice: Agencies must develop a privacy notice, and incorporate the ServicePoint Privacy Notice into its policies and procedures. In addition, HUD mandates that organizations develop policies and procedures to distribute privacy notices to their employees, which include having employees sign to acknowledge receipt of the notices.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

4. HMIS MANAGEMENT & OPERATIONS: DATA QUALITY

4.1 DATA QUALITY STANDARDS

Community level data quality plan and standards are developed and enforced. A standard interview protocol that facilitates the collection of required data elements is developed. These standard interview protocols include standardized intake as well as standardization of all subsequent interviews.

Data Quality Standards:

- HMIS Lead must set data quality benchmarks for CHOs separately for lodging and non-lodging projects.
- Minimum Bed Coverage Rates: Measures the level of lodging project providers' participation in HMIS. Must be calculated separately for emergency shelter, safe haven, transitional housing, and permanent housing.
- Divide the number of HMIS participating by the total number of year-round beds in the CoC geographical area.
- Service-Volume Coverage Rates: Service-Volume coverage rate will all calculation of the coverage rate for a HUD-defined category of projects that do not offer overnight accommodations, such as homelessness prevention projects or street outreach projects. Must be calculated for each comparable database.
- Divide the number of persons served annually by the projects that participate in the HMIS by the number of persons served annually by all CoC projects within the HUD-defined category.
- HMIS Lead must develop and implement a Data Quality Plan. HMIS must be able to generate reports monitoring data quality.

HMIS Leads and CHOs must refer to applicable program regulations in regards to the length of time records are to be maintained and monitored. While the HMIS Lead is permitted to archive the data in HMIS, they must follow HUD archiving data standards.

RESPONSIBLE PARTY: CREATION: COC; ENFORCEMENT: ALL ENTITIES

4.2 UNIVERSAL DATA ELEMENTS

Data quality reports are regularly reviewed at community planning level. These data quality reports generate information that covers data entry completion, consistency with program model, and timeliness as compared to the community data quality standards. All standardized interview protocol adhere to the Universal Data Elements requirements.

The Universal Data Elements will be collected and/or verified per HUD procedure at initial intake and any subsequent program enrollment, and then entered into the HMIS within a specified period of time following the collection of the data.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

4.3 PROGRAM SPECIFIC DATA ELEMENTS

The collection of each data variable and corresponding response categories specific to their program type on all clients served by McKinney-Vento funding is ensured. All standardized interview protocol prescribed by HUD is followed.

The Program-Specific Data Elements are collected and/or verified per HUD procedure at initial intake and any subsequent program enrollment, and then entered into the HMIS within a specified period of days from the collection of the data.

Reporting agencies are required to report program entry and exit dates upon the entry or exit of program participants. Entry dates should record the first day of service or program entry with a new program entry date for each period/episode of service. Exit dates should record the last day of residence in a program's housing before the participant leaves the shelter or the last day a service was provided.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

4.4 DATA QUALITY REPORTS – TECHNICAL ASSISTANCE

Data quality reports that indicate levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards are disseminated to participating programs. Technical assistance and training needs are determined according to these reports.

RESPONSIBLE PARTY: HMIS LEAD

4.5 DATA QUALITY REPORTS TO PLANNING ENTITY

Data quality reports that indicate cross program levels of data entry completion, consistency with program model, and timeliness as compared to the community data quality standards are disseminated to the community planning entity on a regular basis.

RESPONSIBLE PARTY: COC – HMIS COMMITTEE

4.6 META DATA ELEMENTS

Meta Data Elements are defined as elements of information that describes an item; they are not the item itself. Meta Data Elements do not actually appear on the screen, but instead describe the data fields that do appear on the screen. Thus, Meta Data Elements are an integral and automated component of the data collection process. Examples of Meta Data Elements include:

- Data Created
- Data Updated
- Data Collection Stage
- Information Update
- Project Identifier
- Project Entry Identifier
- User

Requirements: Each data variable and corresponding response categories specific to their program type on all clients served by McKinney-Vento funding are collected through proper data collection. All standardized interview protocol adheres to the most current HMIS requirements. Therefore, the Meta Data Elements are collected and/or verified per HUD procedure at initial intake and any subsequent program enrollment, and entered into the HMIS within a specified period of time following the collection of the data.

RESPONSIBLE PARTY: PARTICIPATING AGENCY

5. HMIS POLICY DEVELOPMENT & OVERSIGHT

5.1 PARTICIPATION RATES

HMIS coverage rates of the Humboldt CoC are reviewed and monitored on a regular basis. Agencies with coverage rates lower than 75% participation are required to provide explanation for the barriers to implementation. Ongoing engagement activities and barrier resolution with non-participating agencies is required.

RESPONSIBLE PARTY: HMIS LEAD

5.2 CLIENT CONFIDENTIALITY & PRIVACY TRAINING

Training on client confidentiality and privacy requirements are provided to intake staff, data entry staff, and reporting staff at all participating agencies on a regular basis. All agencies have sufficient privacy policies and protocols in place.

RESPONSIBLE PARTY: HMIS LEAD

5.3 PERFORMANCE MEASUREMENT TRAINING

Regular training and guidance on program performance measurement is provided.

RESPONSIBLE PARTY: HMIS LEAD

5.4 PARTICIPATING AGENCY DOCUMENTATION

The number of participating agencies (utilizing the system) is maintained and documented on a regular basis. A comparative analysis of planned versus actual deployments at the project level is highly desired but not compulsory.

RESPONSIBLE PARTY: HMIS LEAD

5.5 PARTICIPATION RATES

Regular reports on HMIS participation rates are provided to Humboldt CoC. An analysis of agency-specific barriers with potential solutions is highly desired but not compulsory.

RESPONSIBLE PARTY: COC

5.6 POLICIES & PROCEDURES

HMIS Policies and Procedures are fully documented and available.

RESPONSIBLE PARTY: HMIS LEAD

5.7 AGENCY PARTICIPATION AGREEMENT

Written agreements that describe the protocols for participation in the HMIS are established with participating agencies.

RESPONSIBLE PARTY: HMIS LEAD

5.8 DATA SHARING AGREEMENTS

Written agreements with participating agencies who share client level data are maintained. These agreements describe the level of data element or program information sharing among the data sharing HMIS agencies.

Sharing Of Information: Clients must consent to the sharing of their information prior to that information being shared with participating agencies. In the event that the client agrees to have their information entered into the HMIS, but does not agree to have it shared with other agencies, the user can make the client record anonymous by using the 'Private Option'.

Sharing Protected Information: A separate Release of Information (ROI) indicating what information the client agrees to have shared with other participating agencies must be signed prior to sharing of any Protected Personal Information (PPI).

Printed Information: Any printed records that are disclosed to the client or another party should indicate: the person and/or agency to whom the record is directed, the date, and the initials of the person making the disclosure.

Requests For HMIS Client Information: The agency must notify the HMIS Program Administrator within one working day when the agency receives a request from any individual or outside organization for client-identifying information.

Case Notes: It is understood that client case notes will not be shared, and that each agency will have the ability to enter its own private notes about a client. The Release of Information (ROI) form will be a dated document that expires. The provider will only be able to access the information specified on the ROI that was entered into the system during the time the ROI was in effect. Also, the client can decide at any time that they want to have their information closed, in full or in part, and/or client file deactivated.

RESPONSIBLE PARTY: HMIS LEAD

5.9 HMIS END-USER AGREEMENT

A written agreement with each authorized user of the HMIS is maintained. This agreement defines participation protocols, including training criteria, consent protocols, system use, and privacy and security standards.

RESPONSIBLE PARTY: HMIS LEAD

5.10 DATA RELEASE

The CoC maintains a defined, documented HMIS data release protocol that governs release of data from the HMIS.

RESPONSIBLE PARTY: COC

5.11 PROGRAM TRAINING & ORIENTATION

All required ServicePoint Humboldt participants pertaining to HMIS standards receive training and orientation on regulations regarding McKinney-Vento funding.

RESPONSIBLE PARTY: COC

5.12 CLIENT CONSENT

The CoC has a defined and documented client consent protocol to be used as a baseline practice among all participating HMIS users.

RESPONSIBLE PARTY: COC

6. OTHER FEDERAL REQUIREMENTS

6.1 DRUG-FREE WORKPLACE

The HMIS Grantee adopts and enforces a drug-free workplace policy. The policy is posted and available for review.

RESPONSIBLE PARTY: HMIS GRANTEE

6.2 CONFLICT OF INTEREST

The HMIS Grantee adopts a conflict of interest policy for board members, staff, and volunteers.

RESPONSIBLE PARTY: HMIS GRANTEE

6.3 EQUAL OPPORTUNITY & NON-DISCRIMINATION POLICY

The HMIS Grantee adopts an equal opportunity and non-discrimination policy.

RESPONSIBLE PARTY: HMIS GRANTEE

HMIS Lead Signature:



CoC Representative Signature:



Date:



HUMBOLDT HOUSING & HOMELESS COALITION



HUMBOLDT COUNTY CONTINUUM OF CARE

CONTINUUM OF CARE WRITTEN STANDARDS OF SERVICE

NOVEMBER 2015

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The following standards will govern the CoC- and ESG- funded projects in the Humboldt County Continuum of Care. Each program may focus or operate a little differently; however, they will align with these overall standards.

PURPOSE

The HEARTH Act requires the Humboldt County Continuum of Care to have written policies and procedures that govern the provision of assistance to individuals and families. These policies and procedures provide guidance to local providers in administering CoC-funded assistance in the following areas:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive transitional housing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive rapid rehousing assistance;
- Standards for determining what percentage or amount of rent each program participant must pay while receiving rapid rehousing assistance;
- Policies and procedures for determining and prioritizing which eligible individuals and families will receive permanent supportive housing assistance;

The policies and procedures are not intended to be in lieu of or in place of the Interim Regulations for the HEARTH Act, but are intended to clarify local decisions regarding program administration. All HUD funded providers must follow the Interim Regulations in its entirety.

PARTICIPANT ELIGIBILITY AND DOCUMENTATION STANDARDS

The Humboldt County Continuum of Care funds or will fund in 2015 the following program types: Permanent Supportive Housing, Transitional Housing, Planning, Rapid Rehousing, and possibly Coordinated Entry. As set forth in the HEARTH Act, there are four categories of participant eligibility: 1) Literally Homeless, 2) Imminent Risk of Homelessness, 3) Homeless Under Other Federal Statutes (subject to cap), and (4) Fleeing/Attempting to Flee Domestic Violence. The Humboldt County Continuum of Care elects to serve categories 1, 2, and 4 due to the shortage of resources for those priority populations and excessive demand.

Documentation must be included in the case file, and/or scanned into the HMIS client record that demonstrates eligibility as follows:

1. LITERALLY HOMELESS

Eligibility should be documented in the following manner (in order of preference):

- a. Third party verification (HMIS print-out, or written referral/certification by another housing or service provider); or
- b. Written observation by an outreach worker; or
- c. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter;

If the provider is using anything other than a Third Party Verification, the case file must include documentation of due diligence to obtain third party verification.

2. IMMINENT RISK OF HOMELESSNESS

Eligibility should be documented in the following manner (in order of preference):

- a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
- b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
- d. Certification that no subsequent residence has been identified; and
- e. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

3. HOMELESS UNDER OTHER FEDERAL STATUTE (NOT APPLICABLE IN THE HUMBOLDT COUNTY CONTINUUM OF CARE)

4. FLEEING/ATTEMPTING TO FLEE DV

Eligibility should be documented in the following manner (in order of preference):

For victim service providers:

- a. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-victim service providers:

- a. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
- b. Certification by the individual or head of household that no subsequent residence has been identified; and
- c. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

As defined in the HEARTH Act, eligibility for Permanent Supportive Housing is limited to categories 1 and 4.

Participants must also:

- Enter from the street or shelter, or a transitional housing program to which they originally entered from the street or shelter (NOTE: if the project is designated for chronically homeless, they may only enter from the street or shelter. Individuals may lose their chronically homeless designation after they enter a transitional housing program); and
- At least one member of the household must have a disability of long duration, verified either by Social Security or a licensed professional that meets the state criteria for diagnosing and treating that condition.

PRIORITIZATION AND TARGETING

The Humboldt County Continuum of Care prioritizes chronically homeless individuals and families and has committed to adopting a Housing First approach in CoC/ESG programs.

1. For homeless families with children, the Humboldt County CoC seeks to mediate/prevent homelessness whenever possible, reduce the homeless episode for families through rapid rehousing (RRH) and shelter/transitional housing focused on moving families from homelessness to permanent housing as soon as possible, and permanently house the most vulnerable families, as resources are available. Information is gathered to determine the “best fit” intervention to prioritize families for more intensive services. Soon the VI-SPDAT will be used by the in-progress Coordinated Entry system for assessment. Rapid Re-Housing projects serving homeless families with children will strive to place clients into permanent housing within 30 days of entering homelessness, and will not screen out families based on criteria that will not impact future housing success.
2. For vulnerable, chronically homeless individuals, the Humboldt County CoC is in the process of implementing a CoC-wide roll-out of the use of the VI-SPDAT via Coordinated Entry, which identifies those most at risk of dying on the street and will prioritize placement and services for those highest in need. While PSH providers are not required to accept these individuals, bonus points will be awarded in the annual renewal process to providers that elect to do so.

If individuals are not chronically homeless, they will be targeted for the rapid rehousing, transitional housing, permanent housing, or income-based housing that they are best matched to. Non-chronically homeless individuals who identify a substance abuse and/or mental health disorder and interest in receiving services for these concerns will be referred to the appropriate residential treatment programs.

HUD NOTICE CPD 14-012

The Humboldt County CoC has adopted the order of priority described in Notice CPD 14-012.

ORDER OF PRIORITY IN COC PROGRAM-FUNDED PERMANENT SUPPORTIVE HOUSING BEDS DEDICATED TO PERSONS EXPERIENCING CHRONIC HOMELESSNESS AND PERMANENT SUPPORTIVE HOUSING PRIORITIZED FOR OCCUPANCY BY PERSONS EXPERIENCING CHRONIC HOMELESSNESS

FIRST PRIORITY: CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES WITH THE LONGEST HISTORY OF HOMELESSNESS AND WITH THE MOST SEVERE SERVICE NEEDS.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and
2. The CoC or CoC Program recipient has identified the chronically homeless individual or head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs (see Section I.D.3. of this Notice for definition of severe service needs).

SECOND PRIORITY: CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES WITH THE LONGEST HISTORY OF HOMELESSNESS.

A chronically homeless individual or head of household, as defined in 24 CFR 578.3, for which both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for at least 12 months either continuously or on at least four separate occasions in the last 3 years, where the cumulative total length of the four occasions equals at least 12 months; and,
2. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

THIRD PRIORITY: CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES WITH THE MOST SEVERE SERVICE NEEDS.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter on at least four separate occasions in the last 3 years, where the total length of those separate occasions equals less than one year; and
2. The CoC or CoC program recipient has identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs.

FOURTH PRIORITY: ALL OTHER CHRONICALLY HOMELESS INDIVIDUALS AND FAMILIES.

A chronically homeless individual or head of household as defined in 24 CFR 578.3 for whom both of the following are true:

1. The chronically homeless individual or head of household of a family has been homeless and living in a place not meant for human habitation, a safe haven, or in an emergency shelter for on at least four separate occasions in the last 3 years, where the cumulative total length the four occasions is less than 12 months; and
2. The CoC or CoC program recipient has not identified the chronically homeless individual or the head of household, who meets all of the criteria in paragraph (1) of the definition for chronically homeless, of the family as having severe service needs

ORDER OF PRIORITY IN PERMANENT SUPPORTIVE HOUSING BEDS NOT DEDICATED OR PRIORITIZED FOR PERSONS EXPERIENCING CHRONIC HOMELESSNESS

FIRST PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH A DISABILITY WITH THE MOST SEVERE SERVICE NEEDS.

An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter for any period of time, including persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and has been identified as having the most severe service needs.

SECOND PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH A DISABILITY WITH A LONG PERIOD OF CONTINUOUS OR EPISODIC HOMELESSNESS.

An individual or family that is eligible for CoC Program-funded PSH who has been living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution and had been living or residing in one of those locations for at least 6 months or on at least three separate occasions in the last 3 years where the cumulative total is at least 6 months.

THIRD PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH DISABILITY COMING FROM PLACES NOT MEANT FOR HUMAN HABITATION, SAFE HAVENS, OR EMERGENCY SHELTERS.

An individual or family that is eligible for CoC Program-funded PSH who has been living in a place not meant for human habitation, a safe haven, or an emergency shelter. This includes persons exiting an institution where they have resided for 90 days or less but were living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately prior to entering the institution.

FOURTH PRIORITY: HOMELESS INDIVIDUALS AND FAMILIES WITH A DISABILITY COMING FROM TRANSITIONAL HOUSING.

An individual or family that is eligible for CoC Program-funded PSH who is coming from transitional housing, where prior to residing in the transitional housing lived on streets or in an emergency shelter, or safe haven. This priority also includes homeless individuals and homeless households with children with a qualifying disability who were fleeing or attempting to flee domestic violence, dating violence, sexual assault, or stalking and are living in transitional housing—all are eligible for PSH even if they did not live on the streets, emergency shelters, or safe havens prior to entry in the transitional housing.

STANDARDS FOR ADMINISTERING ASSISTANCE

PERMANENT SUPPORTIVE HOUSING

1. Permanent Supportive Housing is community-based housing without a designated length of stay.
2. All CoC funded PSH programs must enter into a lease agreement with tenants that must be at least one year in duration and renewable. The lease agreement must observe Fair Housing regulations.
3. Participants in PSH rental assistance programs are expected to pay the higher of 30% of their income (monthly, adjusted) or 10% of their gross monthly income toward rent (including utilities). If the participant has zero income, the participants are not required to pay rent, but their supportive services partner is

expected to work with them to secure income (either earned or unearned) as soon as possible. In no circumstance can a tenant be charged an amount above the rent calculation standard established by HUD.

4. Participants must meet with a case manager once per month and be reevaluated once per year.
5. Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.
6. CoC-funded PSH projects are strongly encouraged to prioritize or dedicate beds to chronically homeless individuals and families, including chronically homeless youth and domestic violence survivors.

RAPID REHOUSING

1. Rapid rehousing is designed to allow individuals and families receiving assistance to remain stably housed after the conclusion of such assistance.
2. Rental subsidies provided are based on client income. Initial assistance can be as much as 100% of rent depending on client income. Client will pay a percentage of their income in rent based on the program's assessment of the client's financial and family situation.
3. Rental assistance would decline in steps based upon a fixed timeline at the program's discretion based upon the client's financial and family situation.
4. The goal is for households to "graduate" from the program once they no longer meet the eligibility requirements of the program's funding source and/or a Case Manager determines assistance can be terminated, whichever comes first. If the household does not attain any of these goals, assistance ends at 24 months (or earlier time as set by the program).
5. An assessment tool is used regularly to determine the need for ongoing assistance
6. Move In Assistance will be targeted to households who are assessed as able to maintain their unit after the assistance. The amount of move-in assistance is determined by the program, within the limits set by the program's funding source. Move In Assistance may be provided as one time assistance or in tandem with Rental Assistance/Rental Subsidies.
7. In order to qualify for rapid rehousing, households must fall within the target population as well as satisfy the following criteria:
 - a. Meet the current HUD definition of literally homeless for Rapid Re-housing services
 - b. Be the highest priority household available
 - c. Other eligibility criteria created at the program level
8. All housing supported by rapid rehousing resources must meet all HUD requirements, including but not limited to, Housing Quality Standards, rent reasonableness standards, FMR (as relevant), environmental review, and others.
9. Case Managers will provide intensive case management services in order to assist households to successfully retain housing and move off the subsidy and into self-sufficiency. Services will be provided at the program offices and Case Managers will conduct home visits when appropriate.
10. During the clients' participation in the program, clients must meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability. The project is exempt from this requirement if the Violence Against Women Act of 1994 (42 U.S.C. 13925 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits the recipient operating the project from making its housing conditional upon the participant's acceptance of services.
11. All clients may receive follow-up services for up to 6 months to ensure housing stability and assess the effectiveness of RRH programs.

TRANSITIONAL HOUSING

1. Transitional Housing facilitates the movement of homeless individuals and families to PH within 24 months of entering TH.
2. All CoC funded TH programs must enter into a lease or occupancy agreement with tenants that must be at least one month in duration. The lease agreement must observe Fair Housing regulations.
3. Participants in TH rental assistance programs are expected to pay the higher of 30% of their income (monthly, adjusted) or 10% of monthly gross income toward rent (including utilities). If the participant has zero income, the participants are not required to pay rent, but their supportive services partner is expected to work with them to secure income (either earned or unearned) as soon as possible. In no circumstance can a tenant be charged an amount above the Rent Reasonableness standard established by HUD. Rents collected from residents of TH may be reserved in whole or part to assist the residents from they are collected to move to PH.
4. Participants in leasing programs may be charged an occupancy charge up to 30% of the monthly adjusted income; 10% of the family's gross income; or the portion of the family's welfare assistance.

POLICIES AND PROCEDURES

The Continuum of Care (CoC) Interim Rule requires that each CoC have certain policies in writing and approved by the CoC. While the CoC has a number of policies and practices that comply with HUD requirements, important requirements include:

1. Grant Performance Monitoring
2. Education Policies
3. Family Admission/Separation Policies
4. Domestic Violence Policies

GRANT PERFORMANCE MONITORING

The Humboldt County CoC is responsible for monitoring projects that receive Continuum of Care (CoC) and Emergency Solutions Grant (ESG) funds to ensure that the projects are performing adequately, operated effectively, managed efficiently, and in compliance with HUD requirements.

The Executive Committee acting in its capacity as the CoC Board will be responsible for monitoring CoC and ESG project performance through designated CoC staff and subcommittees. It will do so in coordination with the projects that are awarded those funds.

QUARTERLY: The designated body will review program and community-level performance using CoC-developed performance benchmarks. This body will also identify any underperforming, taking into account reduced outcomes due to high-needs populations. To the extent that technical assistance and training is needed, the committee will provide recommendations to the CoC Board. Underperforming projects may be selected for more intensive, on-site monitoring. This may include site visits, client feedback, and/or grant records. Ongoing poor performers may be selected for targeted technical assistance or other response.

ANNUALLY: In addition to the quarterly reports, the CoC Board or designated monitoring body may include a review of the HUD Consolidated Annual Performance and Evaluation Report (CAPER) as well as other local sources to ensure compliance with HUD requirements.

EDUCATION POLICIES

Consistent with the CoC Program Interim Rule 24 CFR §578.23, all CoC and ESG programs assisting families with children or unaccompanied youth must:

1. Take the educational needs of children into account when placing families in housing and will, to the maximum extent practicable, place families with children as close as possible to their school of origin so as not to disrupt such children's education
2. Inform families with children and unaccompanied youth of their educational rights, including providing written materials, help with enrollment, and linkage to McKinney Vento Liaisons as part of intake procedures.
3. Not require children and unaccompanied youth to enroll in a new school as a condition of receiving services.
4. Allow parents or the youth (if unaccompanied) to make decisions about school placement.
5. Not require children and unaccompanied youth to attend after-school or educational programs that would replace/interfere with regular day school or prohibit them from staying enrolled in their original school.
6. Post notices of student's rights at each program site that serves homeless children and families in appropriate languages.
7. Designate staff that will be responsible for:
 - a. ensuring that homeless children and youth in their programs are in school and are receiving all educational services they are entitled to.
 - b. coordinating with the CoC, the Department of Social Services, the County Office of Education, the McKinney Vento Coordinator, the McKinney Vento Educational Liaisons, and other mainstream providers as needed.

In order to ensure compliance and to assist providers in meeting these requirements, the CoC will provide training on these issues annually and will include these in the funding competition review and ranking process.

FAMILY ADMISSION/SEPARATION POLICIES

Consistent with the CoC Program Interim Rule §578.93, neither CoC nor ESG program-funded projects may involuntarily separate families: The age and gender of a child under age 18 must not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds. The gender and marital status of a parent or parents may also not be used as a basis for denying any family's admission to a project that receives CoC or ESG funds.

The CoC will work closely with providers to ensure that placement efforts are coordinated to avoid involuntary family separation, including referring clients for the most appropriate services and housing to match their needs.

Any client that believes that they or a family member has experienced involuntary separation may report the issue to the CoC. The CoC will investigate the claim and take appropriate remedial action.

DOMESTIC VIOLENCE/PRIVACY POLICIES

All efforts shall be made to protect the privacy and safety of domestic violence survivors and to uphold client choice by presenting a range of housing and service options. The following procedures are in place to do that.

PRIVACY AND SAFETY

3. Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

EXPANDING THE WRITTEN STANDARDS

In the future the CoC will likely wish to further expand and refine the written standards to cover:

1. Prioritization for other housing types (e.g. prevention)
2. Additional housing requirement options
3. Additional options for service requirements

In addition, the written standards may include:

1. Reasonable accommodation processes
2. Other policies and procedures

Programs which are primarily for survivors of violence are prohibited from contributing client-level data into the HMIS. However, these programs must record client-level data within a comparable internal database and be able to generate aggregate data for inclusion in reports.

Non-victim service providers shall protect the privacy of individuals and families who are fleeing, or attempting to flee violence, by not including intake/treatment data in HMIS.

The location of Domestic Violence shelters/programs shall not be made public.

Staff responsible for coordinated intake/assessment shall receive training on protecting the safety and privacy of individuals who are fleeing, or attempting to flee violence.

For each program participant who moved to a different Continuum of Care due to imminent threat of further violence under § 578.51(c)(3), the CoC program must retain:

1. **DOCUMENTATION OF THE ORIGINAL INCIDENCE OF VIOLENCE.** This may be written observation of the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; medical or dental records; court records or law enforcement records; or written certification by the program participant to whom the violence occurred or by the head of household.
2. **DOCUMENTATION OF THE REASONABLE BELIEF OF IMMINENT THREAT OF FURTHER VIOLENCE, WHICH WOULD INCLUDE THREATS FROM A THIRD-PARTY, SUCH AS A FRIEND OR FAMILY MEMBER OF THE PERPETRATOR OF THE VIOLENCE.** This may be written observation by the housing or service provider; a letter or other documentation from a victim service provider, social worker, legal assistance provider, pastoral counselor, mental health provider, or other professional from whom the victim has sought assistance; current restraining order; recent court order or other court records; law enforcement report or records; communication records from the perpetrator of the violence or family members or friends of the perpetrator of the violence, including emails, voicemails, text messages, and social media posts; or a written certification by the program participant to whom the violence occurred or the head of household.

CERTIFICATION OF HOMELESSNESS

FOR VICTIM SERVICE PROVIDERS

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

FOR NON-VICTIM SERVICE PROVIDERS

1. Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and